FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Altec, LLC
242 America Place
Jeffersonville, Indiana 47130

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 019-13802-00015	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 26, 2002 Expiration Date: July 26, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary aluminum parts extrusion source.

Authorized Individual:	Mike Mackin
Source Address:	242 America Place, Jeffersonville, Indiana 47130
Mailing Address:	P.O. Box 808, Jeffersonville, Indiana 47130
General Source Phone Number:	(812) 282-8256
SIC Code:	3354
County Location:	Clark
Source Location Status:	Moderate nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, heat input capacity: 3.0 million British thermal units per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour, as follows:

(1) One (1) paint burn off cleaning furnace, fired by natural gas or propane, constructed in 1987, identified as Unit 3, heat input capacity: 0.35 million British thermal units per hour. [326 IAC 4-2-2]

(2) Five (5) aging ovens, fired by natural gas or propane, capacity: 3.5 million British thermal units per hour, each.

(3) One (1) billet oven, fired by natural gas or propane, capacity: 3.3 million British

thermal units per hour.

(4) Two (2) billet ovens, fired by natural gas or propane, capacity: 5.4 million British thermal units per hour, each.

(5) One (1) pretreatment washer, fired by natural gas, capacity: 2.0 million British thermal units per hour.

(6) One (1) pretreatment washer, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(7) Two (2) office furnaces, fired by natural gas, capacity: 0.125 million British thermal units per hour, each.

(8) One (1) pretreatment drying oven, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(9) One (1) paint bake oven, fired by natural gas or propane, capacity: 4.0 million British thermal units per hour.

(b) Degreasing operations (occasional wiping of parts for the purpose of cleaning)

(c) Quenching operations (rapidly cooling extruded aluminum after ovens by use of water)

(d) Paved roads and parking lots

(e) De-bridging process (sawing aluminum contact points in window frames).

(f) Combustion source flame safety purging on startup.

(g) Heat exchanger cleaning and repair.

(h) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(k) Filter or coalescer media changeout.

(l) Three (3) electric water heaters.

(m) One (1) electric heated caustic solution tank, using sodium hydroxide and water.

(n) One (1) mechanical blast unit equipped with a baghouse. [326 IAC 6-1]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual"

as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or fan amperage, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure

compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements

of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The

reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Painting prior to start-up of the thermal oxidizer for emission reduction purposes

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, heat input capacity: 3.0 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Thermal Oxidizer

Upon startup of the thermal oxidizer for emissions reduction purposes, the thermal oxidizer shall remain in operation at all times when the twin paint booth is in operation. At that time, the Permittee shall be subject to the requirements of Section D.3 of this permit and the requirements of Section D.1 shall no longer be applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-3]

The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the VOC used for cleanup, shall not exceed a total of 98.7 tons per consecutive twelve (12) month period. This will limit the VOC emissions from the entire source, to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply. Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus amount of that HAP used for cleanup, shall not exceed 9.00 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.

(b) The combination of HAPs delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the total HAPs used for cleanup, shall not exceed a total of 23.5 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) twin paint booth (Unit 1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings. The effect of the thermal oxidizer shall not be considered when demonstrating compliance with 326 IAC 8-2-9.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, when practical, a nonphotochemically reactive hydrocarbon solvent, as defined in 326 IAC 1-2-48, shall be used to comply with (b) of this condition. The Permittee shall notify IDEM, OAQ, when changing to any VOC containing solvent and state the reasons thereof.

D.1.5 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) twin paint booth (Unit 1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-5925-00015, issued December 10, 1996, Condition D.1.4, which states that the twin paint booth shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) twin paint booth. The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 of FESOP 019-5925-00015, issued on December 10, 1996, is hereby rescinded.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.9 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.10 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the twelve (12) month period.

D.1.11 Particulate Matter (PM)

In order to comply with Conditions D.1.5 and C.1, the dry filters for PM control shall be in operation

at all times when the one (1) twin paint booth (Unit 1) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Thermal Oxidizer

The thermal oxidizer is not required to operate at all times that the twin paint booth is in operation. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, until actual startup of the thermal oxidizer for emission reduction purposes, the Permittee may operate the thermal oxidizer alternatively for maintenance purposes only on an as needed basis, while not claiming emissions reductions for this unit. These startups for preventive maintenance purposes shall be documented accordingly.

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.2 and D.1.4, and the HAP usage limits and HAP emission limits established in Condition D.1.3.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, individual HAP and total HAP usage for each month; and

(5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour, as follows:

(1) One (1) paint burn off cleaning furnace, fired by natural gas or propane, constructed in 1987, identified as Unit 3, heat input capacity: 0.35 million British thermal units per hour. [326 IAC 4-2-2]

(2) Five (5) aging ovens, fired by natural gas or propane, capacity: 3.5 million British thermal units per hour, each.

(3) One (1) billet oven, fired by natural gas or propane, capacity: 3.3 million British thermal units per hour.

(4) Two (2) billet ovens, fired by natural gas or propane, capacity: 5.4 million British thermal units per hour, each.

(5) One (1) pretreatment washer, fired by natural gas, capacity: 2.0 million British thermal units per hour.

(6) One (1) pretreatment washer, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(7) Two (2) office furnaces, fired by natural gas, capacity: 0.125 million British thermal units per hour, each.

(8) One (1) pretreatment drying oven, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(9) One (1) paint bake oven, fired by natural gas or propane, capacity: 4.0 million British thermal units per hour.

(b) Degreasing operations (occasional wiping of parts for the purpose of cleaning)

(c) Quenching operations (rapidly cooling extruded aluminum after ovens by use of water)

(d) Paved roads and parking lots

(e) De-bridging process (sawing aluminum contact points in window frames).

(f) Combustion source flame safety purging on startup.

(g) Heat exchanger cleaning and repair.

(h) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(k) Filter or coalescer media changeout.

(l) Three (3) electric water heaters.

(m) One (1) electric heated caustic solution tank, using sodium hydroxide and water.

(n) One (1) mechanical blast unit equipped with a baghouse. [326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), the one (1) insignificant mechanical blast unit at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

D.2.2 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the one (1) insignificant paint burn off cleaning furnace, which serves as an incinerator, shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 (Opacity limitations) and 326 IAC 2 (Permit Review Rules);

(d) Be maintained properly as specified by the manufacturer and approved by IDEM;

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous materials including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented;

(h) Not create a nuisance or a fire hazard; and

(i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of the incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

In order to comply with D.2.1, the baghouse for PM control shall be in operation and control emissions from the one (1) insignificant mechanical blast unit at all times that the one (1) insignificant mechanical blast unit is in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Painting upon start-up of the thermal oxidizer for emission reduction purposes

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, heat input capacity: 3.0 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Thermal Oxidizer

The Permittee shall not be subject to the requirements of Section D.3 until start-up of the thermal oxidizer for emissions reduction purposes. Upon start-up of the thermal oxidizer for emission reduction purposes, the Permittee shall be subject to the requirements of Section D.3 of this permit and the requirements of Section D.1 shall no longer be applicable.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-3]

Upon startup of the thermal oxidizer for emission reduction purposes, the thermal oxidizer shall remain in operation and control emissions from the twin paint booth at all times when the twin paint booth is in operation. At that time, the amount of VOC delivered to the applicators, plus the VOC used for cleanup, shall be considered after the effect of the thermal oxidizer and the VOC emissions shall not exceed 98.7 tons per consecutive twelve (12) month period. The overall VOC control efficiency shall be maintained at a level determined necessary for compliance with this condition, based on the most recent stack test. When the thermal oxidizer is used to show compliance, the VOC emissions shall be determined by the following equation:

VOC Emissions (tons) = VOC usage, including cleanup (tons) x (1 - Control Efficiency)

D.3.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Upon startup of the thermal oxidizer for emission reduction purposes, the thermal oxidizer shall remain in operation and control emissions from the twin paint booth at all times when the twin paint booth is in operation. At that time, the amount of HAP delivered to the applicators, plus the HAPs used for cleanup, shall be considered after the effect of the thermal oxidizer and HAP emissions shall not exceed 9.00 tons per twelve (12) consecutive month period of each individual HAP and 23.5 tons per twelve (12) consecutive month period of total HAPs. The overall individual and total HAP control efficiencies shall be maintained at a level determined necessary for compliance with this condition, based on the most recent stack test. When the thermal oxidizer is used to show compliance, the HAP emissions shall be determined by the following equation:

HAP Emissions (tons) = HAP usage, including cleanup (tons) x (1 - Control Efficiency)

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) twin paint booth (Unit 1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile

organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings. The effect of the thermal oxidizer shall not be considered when demonstrating compliance with 326 IAC 8-2-9.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, when practical, a nonphotochemically reactive hydrocarbon solvent, as defined in 326 IAC 1-2-48, shall be used to comply with (b) of this condition. The Permittee shall notify IDEM, OAQ, when changing to any VOC containing solvent and state the reasons thereof.

D.3.5 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) twin paint booth (Unit 1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-5925-00015, issued December 10, 1996, Condition D.1.4, which states that the twin paint booth shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) twin paint booth. The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 of FESOP 019-5925-00015, issued on December 10, 1996, is hereby rescinded.

D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.7 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, within 180 days of actual startup of the thermal oxidizer for emission reduction purposes, the Permittee shall perform VOC, HAP, and operating temperature testing of the thermal oxidizer to demonstrate compliance with Conditions D.3.2 and D.3.3 utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.3.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 VOC Emissions

Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.3.10 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.3.11 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.3.3 shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the twelve (12) month period.

D.3.12 Particulate Matter (PM)

In order to comply with Conditions D.3.5 and C.1, the dry filters for PM control shall be in operation at all times when the one (1) twin paint booth (Unit 1) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.13 Thermal Oxidizer

(a) Upon startup of the thermal oxidizer for emissions reduction purposes, the thermal oxidizer shall remain in operation at all times when the twin paint booth is in operation.

(b) When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. The temperature shall correlate to the overall VOC and HAP control efficiency determined necessary for compliance with Conditions D.3.2 and D.3.3, based on the stack capture and destruction efficiency test.

D.3.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.3.15 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded. When for any one reading, the temperature is less than the temperature used to demonstrate compliance during the most recent compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is less than the temperature used to demonstrate compliance during the most recent

compliance stack test is not a deviation from this permit.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. When for any one reading, the this pressure or amperage is outside the normal range as established in must recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure or amperage reading that is outside the range established in must recent compliant stack test is not a deviation from this permit.

(c) Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.16 Record Keeping Requirements

(a) To document compliance with Conditions D.3.2, D.3.3, D.3.4, D.3.13 and D.3.15, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.3.2 and D.3.4, the HAP usage limits and HAP emission limits established in Condition D.3.3, and the monitoring requirements of Conditions D.3.13 and D.3.15.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, individual HAP and total HAP usage for each month;

(5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period;

(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test, after startup of the thermal oxidizer;

(7) Weekly records of the duct pressure or fan amperage of the thermal oxidizer after startup; and

(8) Overall VOC and HAP control efficiencies of the thermal oxidizer, when the thermal oxidizer is used to demonstrate compliance, and the data used to compute those efficiencies.

(b) To document compliance with Condition D.3.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.2 and D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Altec, LLC
Source Address: 242 America Place, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 808, Jeffersonville, Indiana 47130
FESOP No.: F 019-13802-00015

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Altec, LLC
Source Address: 242 America Place, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 808, Jeffersonville, Indiana 47130
FESOP No.: F 019-13802-00015

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FESOP Quarterly Report

Source Name: Altec, LLC
Source Address: 242 America Place, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 808, Jeffersonville, Indiana 47130
FESOP No.: F 019-13802-00015
Facility: One (1) twin paint booth (Unit 1)
Parameters: Total VOC, each individual HAP and combination of HAPs delivered to the applicators, plus VOC and HAPs used for cleanup
Limits: VOC: No more than 98.7 tons per consecutive twelve (12) month period, without the thermal oxidizer
Each Individual HAP: No more than 9.00 tons per consecutive twelve (12) month period, without the thermal oxidizer
Total HAPs: No more than 23.5 tons per consecutive twelve (12) month period, without the thermal oxidizer
With thermal oxidizer: VOC, individual HAP, and total HAPs Emissions no more than 98.7, 9.00, 23.5 tons per consecutive twelve (12) month period, respectively, where VOC/HAP Emissions (tons) = VOC/HAPs usage, including cleanup (tons) x (1 - Control Efficiency)

YEAR: _____

DATE OF STARTUP OF THERMAL OXIDIZER FOR EMISSION REDUCTION PURPOSES (if applicable): _____

Month	VOC (Tons)	VOC (Tons)	VOC (Tons)	Individual HAP (Tons)	Individual HAP (Tons)	Individual HAP (Tons)	Total HAPs (Tons)	Total HAPs (Tons)	Total HAPs (Tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Altec, LLC
Source Address: 242 America Place, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 808, Jeffersonville, Indiana 47130
FESOP No.: F 019-13802-00015

Months:_____ to_____Year:_____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: ____________________

Form Completed By: ________________________________

Title/Position: ________________________________

Date: ________________________________

Phone: ________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**Altec, LLC**
Source Location:	**242 America Place, Jeffersonville, Indiana 47130**
County:	**Clark**
SIC Code:	**3354**
Operation Permit No.:	**F 019-13802-00015**
Permit Reviewer:	**CarrieAnn Paukowits**

On October 19, 2001, the Office of Air Quality (OAQ) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Altec, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate an aluminum parts extrusion source with dry filters and a thermal oxidizer as controls. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 15, 2001, Evelyn Crooks of Environmental Compliance Source, on behalf of Altec, LLC, submitted comments on the proposed FESOP Renewal. The summary of the comments and corresponding responses are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

(a) Condition C.6 - Is condition D.1.1(b) sufficiently specific to prevent a conflict with the requirements of Condition C.6?

(b) The original FESOP, F 019-5925-00015, issued to this source in December 1996, contained the provision in D.1.1(d) that the thermal oxidizer could be used to control VOC emissions. A copy of that text is attached for your reference. Altec insists that Condition D.1 in the proposed FESOP retain that language.

Response 1:

The wording in D.1.1(d) of the original FESOP (F 019-5925-00015, issued on December 10, 1996) was retained as Condition D.1.1(b) of the proposed FESOP. Neither condition specifically states that the thermal oxidizer is required for compliance with the limitations of 326 IAC 2-8-4. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, until actual startup of the thermal oxidizer, the Permittee may operate the thermal oxidizer alternatively for maintenance purposes only on an as needed basis, while not claiming emissions reductions for this unit. Upon startup of the thermal oxidizer for emission reduction purposes, the thermal oxidizer must be used at all times when the twin paint booth is in operation. Allowing alternating scenarios between a twelve (12) month VOC or HAP emission limit after control by the thermal oxidizer and a VOC and HAP usage limit without operating the thermal oxidizer would make compliance determination and record keeping extremely difficult. To clarify the permit requirements, Section D.1 has been divided into two (2) separate sections. Section D.1 addresses the permit requirements prior to operating the thermal oxidizer for emission reduction purposes.

Section D.3 will contain permit requirements upon start-up of the thermal oxidizer to reduce emissions. To prevent confusion, Section A.2(b) has also been revised. The permit is revised as follows (changes indicated are changes from the corresponding condition in the proposed Section D.1 after changes made elsewhere in this addendum):

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, used ~~during alternative operating scenarios, with start-up for preventive purposes on an as needed basis,~~ heat input capacity: 3.0 million British thermal units per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Painting prior to start-up of the thermal oxidizer for emission reduction purposes

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, ~~used during alternative operating scenarios, with start-up for preventive purposes on an as needed basis,~~ heat input capacity: 3.0 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Thermal Oxidizer

Upon startup of the thermal oxidizer for emissions reduction purposes, the thermal oxidizer shall remain in operation at all times when the twin paint booth is in operation. At that time, the Permittee shall be subject to the requirements of Section D.3 of this permit and the requirements of Section D.1 shall no longer be applicable.

D.1.~~1~~ **2** Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-3]

~~(a)~~ The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the VOC used for cleanup, shall not exceed a total of 98.7 tons per consecutive twelve (12) month period. This will limit the VOC emissions from the entire source, to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply. **Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.**

~~(b) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the thermal oxidizer is used to control VOC emissions, the amount of VOC delivered to the applicators, plus the VOC used for cleanup, shall be considered after the effect of the thermal oxidizer. When the thermal oxidizer is used to show compliance, the VOC emissions shall be determined by the following equation:~~

~~VOC Emissions (tons) = VOC usage, including cleanup (tons) x (1 - Control Efficiency)~~

D.1.~~2~~ **3** Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus amount of that HAP used for cleanup, shall not exceed 9.00 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. **Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.**

(b) The combination of HAPs delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the total HAPs used for cleanup, shall not exceed a total of 23.5 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply. **Operation of the thermal oxidizer is not required at all times in order for the source to comply with this limitation.**

~~(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the thermal oxidizer is used to control HAP emissions the amount of HAP delivered to the applicators, plus the HAPs used for cleanup, shall be considered after the effect of the thermal oxidizer. When the thermal oxidizer is used to show compliance, the HAP emissions shall be determined by the following equation:~~

~~HAP Emissions (tons) = HAP usage, including cleanup (tons) x (1 - Control Efficiency)~~

D.1.~~3~~ **4** Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) twin paint booth (Unit 1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings. The effect of the thermal oxidizer shall not be considered when demonstrating compliance with 326 IAC 8-2-9.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, when practical, a nonphotochemically reactive hydrocarbon solvent, as defined in 326 IAC 1-2-48, shall be used to comply with (b) of this condition. The Permittee shall notify IDEM, OAQ, when changing to any VOC containing solvent and state the reasons thereof.

D.1.~~4~~ **5** Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) twin paint booth (Unit 1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-5925-00015, issued December 10, 1996, Condition D.1.4, which states that the twin paint booth shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) twin paint booth. The requirements of

326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 of FESOP 019-5925-00015, issued on December 10, 1996, is hereby rescinded.

D.1.~~5~~ **6** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

~~D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]~~

~~Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, within 180 days of actual startup of the thermal oxidizer, the Permittee shall perform VOC, HAP, and operating temperature testing of the thermal oxidizer to demonstrate compliance with Conditions D.1.1 and D.1.2 utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.~~

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.1~~ **D.1.2** and ~~D.1.3~~ **D.1.4** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition ~~D.1.1~~ **D.1.2** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.9 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition ~~D.1.2~~ **D.1.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.10 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition ~~D.1.2~~ **D.1.3** shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the twelve (12) month period.

D.1.11 Particulate Matter (PM)

In order to comply with Conditions ~~D.1.4~~ **D.1.5** and C.1, the dry filters for PM control shall be in operation at all times when the one (1) twin paint booth (Unit 1) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.12 Thermal Oxidizer

~~(a)~~ The thermal oxidizer is not required to operate at all times that the twin paint booth is in operation. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, until actual startup of the thermal oxidizer **for emission reduction purposes**, the Permittee may operate the thermal oxidizer alternatively for maintenance purposes only on an as needed basis, while not claiming emissions reductions for this unit. These startups for preventive maintenance purposes shall be documented accordingly.

~~(b) When operating, the thermal incinerator shall maintain a minimum operating temperature~~

~~of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM.~~

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

~~D.1.14 Parametric Monitoring~~

~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded. When for any one reading, the temperature is less than the temperature used to demonstrate compliance during the most recent compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is less than the temperature used to demonstrate compliance during the most recent compliance stack test is not a deviation from this permit.~~

~~(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. When for any one reading, the this pressure or amperage is outside the normal range as established in must recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure or amperage reading that is outside the range established in must recent compliant stack test is not a deviation from this permit.~~

~~(c) Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.15~~5~~ **4**Record Keeping Requirements

(a) To document compliance with Conditions ~~D.1.1,~~ D.1.2, D.1.3, **and D.1.4** ~~D.1.12 and D.1.14~~, the Permittee shall maintain records in accordance with (1) through **(5)** ~~(8)~~ below. Records maintained for (1) through **(5)** ~~(8)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits

established in Condition**s D.1.2 and D.1.4** ~~D.1.1 and D.1.3~~, and the HAP usage limits and HAP emission limits established in Condition ~~D.1.2~~ **D.1.3**.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, individual HAP and total HAP usage for each month; **and**

(5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.

~~(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test, after startup of the thermal oxidizer;~~

~~(7) Weekly records of the duct pressure or fan amperage of the thermal oxidizer after startup; and~~

~~(8) Overall VOC and HAP control efficiencies of the thermal oxidizer, when the thermal oxidizer is used to demonstrate compliance, and the data used to compute those efficiencies.~~

(b) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.1~~6~~**5** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.1.1 and~~ D.1.2 **and D.1.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Painting upon start-up of the thermal oxidizer for emission reduction purposes

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, ~~used during alternative operating scenarios, with start-up for preventive purposes on an as needed basis,~~ heat input capacity: 3.0 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Thermal Oxidizer

The Permittee shall not be subject to the requirements of Section D.3 until start-up of the thermal oxidizer for emissions reduction purposes. Upon start-up of the thermal oxidizer for emission reduction purposes, the Permittee shall be subject to the requirements of Section D.3 of this permit and the requirements of Section D.1 shall no longer be applicable.

D.3.~~1~~ **2** Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-3]

~~(a) The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the VOC used for cleanup, shall not exceed a total of 98.7 tons per consecutive twelve (12) month period. This will limit the VOC emissions from the entire source, to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.~~

~~(b) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the~~ **Upon startup of the thermal oxidizer for emission reduction purposes, the thermal oxidizer shall remain in operation and control emissions from the twin paint booth at all times when the twin paint booth is in operation. At that time,** ~~thermal oxidizer is used to control VOC emissions,~~ the amount of VOC delivered to the applicators, plus the VOC used for cleanup, shall be considered after the effect of the thermal oxidizer **and the VOC emissions shall not exceed 98.7 tons per consecutive twelve (12) month period**. **The overall VOC control efficiency shall be maintained at a level determined necessary for compliance with this condition, based on the most recent stack test.** When the thermal oxidizer is used to show compliance, the VOC emissions shall be determined by the following equation:

VOC Emissions (tons) = VOC usage, including cleanup (tons) x (1 - Control Efficiency)

D.3.~~2~~ **3** Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

~~(a) The worst case single HAP delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus amount of that HAP used for cleanup, shall not exceed 9.00 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

~~(b) The combination of HAPs delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the total HAPs used for cleanup, shall not exceed a total of 23.5 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

~~(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the~~ **Upon startup of the thermal oxidizer for emission reduction purposes, the thermal oxidizer shall remain in operation and control emissions from the twin paint booth at all times when the twin paint booth is in operation. At that time,** ~~thermal oxidizer is used to control HAP emissions~~ the amount of HAP delivered to the applicators, plus the HAPs used for cleanup, shall be considered after the effect of the thermal oxidizer **and HAP emissions shall not exceed 9.00 tons per twelve (12) consecutive month period of each individual HAP and 23.5 tons per twelve (12) consecutive month period of total HAPs**. **The overall individual and total HAP control efficiencies shall be maintained at a level determined necessary for compliance with this condition, based on the most recent stack test.** When the thermal oxidizer is used to show compliance, the HAP emissions shall be determined by the following equation:

HAP Emissions (tons) = HAP usage, including cleanup (tons) x (1 - Control Efficiency)

D.3.~~3~~ **4** Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) twin paint booth (Unit 1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings. The effect of the thermal oxidizer shall not be considered when demonstrating compliance with 326 IAC 8-2-9.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, when practical, a nonphotochemically reactive hydrocarbon solvent, as defined in 326 IAC 1-2-48, shall be used to comply with (b) of this condition. The Permittee shall notify IDEM, OAQ, when changing to any VOC containing solvent and state the reasons thereof.

D.3.~~4~~ **5** Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) twin paint booth (Unit 1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

(b) The requirement from FESOP 019-5925-00015, issued December 10, 1996, Condition D.1.4, which states that the twin paint booth shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour, has not been included in the renewal. This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) twin paint booth. The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 of FESOP 019-5925-00015, issued on December 10, 1996, is hereby rescinded.

D.3.~~5~~ **6** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.~~6~~ **7** Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, within 180 days of actual startup of the thermal oxidizer **for emission reduction purposes**, the Permittee shall perform VOC, HAP, and operating temperature testing of the thermal oxidizer to demonstrate compliance with Conditions ~~D.3.1 and~~ D.3.2 **and D.3.3** utilizing Methods 25 (40 CFR 60, Appendix A) for VOC or other methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.3.~~7~~ **8** Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions ~~D.3.1 and D.3.3~~ **D.3.2 and D.3.4** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.~~8~~ **9** VOC Emissions

Compliance with Condition ~~D.3.1~~ **D.3.2** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.3.~~9~~**10** Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition ~~D.3.2~~ **D.3.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.3.1~~0~~**1** Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition ~~D.3.2~~ **D.3.3** shall be demonstrated within 30 days of the end of each month based on the total single and combination of HAPs usage for the twelve (12) month period.

D.3.1~~1~~**2** Particulate Matter (PM)

In order to comply with Conditions ~~D.3.4~~ **D.3.5** and C.1, the dry filters for PM control shall be in operation at all times when the one (1) twin paint booth (Unit 1) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.1~~2~~**3** Thermal Oxidizer

(a) ~~The thermal oxidizer is not required to operate at all times that the twin paint booth is in operation. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1998, until actual startup of the thermal oxidizer, the Permittee may operate the thermal oxidizer alternatively for maintenance purposes only on an as needed basis, while not claiming emissions reductions for this unit. These startups for preventive maintenance purposes shall be documented accordingly.~~ **Upon startup of the thermal oxidizer for emissions reduction purposes, the thermal oxidizer shall remain in operation at all times when the twin paint booth is in operation.**

(b) When operating, the thermal **oxidizer** ~~incinerator~~ shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. **The**

temperature shall correlate to the overall VOC and HAP control efficiency determined necessary for compliance with Conditions D.3.2 and D.3.3, based on the stack capture and destruction efficiency test.

D.3.13~~4~~Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.3.14~~5~~Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded. When for any one reading, the temperature is less than the temperature used to demonstrate compliance during the most recent compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is less than the temperature used to demonstrate compliance during the most recent compliance stack test is not a deviation from this permit.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. When for any one reading, the this pressure or amperage is outside the normal range as established in must recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure or amperage reading that is outside the range established in must recent compliant stack test is not a deviation from this permit.

(c) Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.15~~6~~Record Keeping Requirements

(a) To document compliance with Conditions ~~D.3.1,~~ D.3.2, D.3.3, **D.3.4,** ~~D.3.12~~ **D.3.13** and ~~D.3.14~~ **D.3.15**, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC

emission limits established in Condition**s** ~~D.3.1 and D.3.3~~ **D.3.2 and D.3.4**, ~~and~~ the HAP usage limits and HAP emission limits established in Condition ~~D.3.2~~ **D.3.3, and the monitoring requirements of Conditions D.3.13 and D.3.15**.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, individual HAP and total HAP usage for each month;

(5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period;

(6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test, after startup of the thermal oxidizer;

(7) Weekly records of the duct pressure or fan amperage of the thermal oxidizer after startup; and

(8) Overall VOC and HAP control efficiencies of the thermal oxidizer, when the thermal oxidizer is used to demonstrate compliance, and the data used to compute those efficiencies.

(b) To document compliance with Condition ~~D.3.13~~ **D.3.14**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.1~~6~~**7** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.3.1 and~~ D.3.2 **and D.3.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Comment 2:

Condition C.18 - The due date for this emission statement is not specified. Does it remain April 15 of each year?

Response 2:

Pursuant to 326 IAC 2-6-3, Emission Reporting - Compliance Schedule, the emission statement is due by April 15 of each year. No date is specified in the permit because the requirements of 326 IAC 2-6 may change prior to the expiration date of the permit.

Comment 3:

Condition D.1.8(c) - AAF 019-9653-00015 was issued August 17, 1998.

Response 3:

The Administrative Amendment, AAF 019-9653-00015, was issued on August 7, 1998. The date has been corrected in Conditions D.1.3, D.1.6 and D.1.12 (now D.1.4, D.1.12, D.3.4, and D.3.7) as follows:

August 7, ~~1999~~ **1998**

Comment 4:

Condition D.2.2(i) - The incinerator/burn off oven limitations in the December 1996 permit are "0.5 pounds per 1,000 pounds of dry exhaust gas corrected to 50 percent excess air." The size of the emission unit did not change. Altec requests that the emission limit be retained at the 0.5 pound level.

Response 4:

The limit in the proposed FESOP of 0.3 pounds per 1,000 pounds of dry exhaust gas is a typographical error. The emission limitation in the original FESOP, F 019-5925-00015, issued on December 10, 1996, of 0.5 pounds per 1,000 pounds of dry exhaust gas corrected to 50 percent excess air is correct, and Condition D.2.2(i) has been corrected as follows:

(i) Not emit particulate matter (PM) in excess of ~~0.3~~ **0.5** pounds per 1,000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

Comment 5:

Report Pages 37, 38 and 39 - Altec requests that these reports be combined into one page similar to the example from F 003-5756-00236 which is attached for your reference. At a minimum, we wish to combine pages 38 and 39 to account for the HAPs on one report form.

Response 5:

The three (3) report forms have been combined into one (1) form as shown in the attached form. Language added that was not from one (1) of the original three (3) forms is in bold type.

On December 7, 2001, Evelyn Crooks of Environmental Compliance Source, on behalf of Altec, LLC, submitted the following additional comment on the proposed FESOP Renewal (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 6:

We request, for the sake of consistency, that the word "incinerator" in D.1.12(c) be changed to "oxidizer."

Response 6:

In response to this comment, Condition D.1.12(c) (now D.3.13(b)) has been revised as indicated in Response 1.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

(a) Reports of deviations from permit requirements, test protocols, and Quarterly Deviation and Compliance Monitoring Reports should be submitted to the Compliance Data Section, and not the Compliance Branch. The address in Conditions B.15 (Deviations from Permit Requirements and Conditions), C.9 (Performance Testing), and C.20 (General Reporting Requirements) has been revised as follows:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The titles on the Certification, Quarterly Deviation and Compliance Monitoring Report and FESOP Quarterly Report forms are revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
~~COMPLIANCE BRANCH~~
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE ~~BRANCH~~ **DATA SECTION**
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE ~~BRANCH~~ **DATA SECTION**
FESOP Quarterly Report

Change 2:

Condition A.5, Prior Permits Superseded, replaced Prior Permit Conditions in the proposed permit to implement the intent of the new rule, 326 IAC 2-1.1-9.5, as follows:

~~A.5 Prior Permit Conditions~~

~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~

~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

Change 3:

The IDEM, OAQ, has revised Condition B.15, Deviations from Permit Requirements and Conditions, and D.1.14 (now D.3.15), Parametric Monitoring, to address concerns regarding the independent enforceability of permit conditions [see 326 IAC 2-8-4(5)]. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations. Condition D.1.14 (now D.3.15) has been revised to clarify when a deviation results from parametric monitoring and to reference to the revised Condition C.16 described in Change 5.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

D.3.15 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded. **When for any one reading**, **the** ~~and that~~ temperature ~~shall be greater~~ **is less** than ~~or equal to~~ the temperature used to demonstrate compliance during the most recent compliance stack test**, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is less than the temperature used to demonstrate compliance during the most recent compliance stack test is not a deviation from this permit.**

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. **When for any one reading, the** this pressure or amperage ~~shall be maintained within a~~ **is outside the normal** range as established in must recent compliant stack test**, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure or amperage reading that is outside the range established in must recent compliant stack test is not a deviation from this permit.**

(c) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a reading is outside the above mentioned range for any one reading.~~ Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

Change 4:

326 IAC 2-8-3 requires any application form, report, or compliance certification to be certified by the Authorized Individual. IDEM, OAQ has revised Condition C.8, Asbestos Abatement Projects, to clarify that the asbestos notification does not require a certification by the authorized individual, but it does need to be certified by the owner or operator. IDEM, OAQ has also revised Condition C.17, Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the authorized individual is required for the notification sent in response to non-compliance with a stack test.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Change 5:

The IDEM, OAQ has restructured Condition C.16 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition. The proposed condition, and the conditions which reference this condition, have been changed as follows:

C.16 Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ, upon request ~~and shall be subject to review and approval by IDEM, OAQ, (and local agency if applicable)~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee**, ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:**

~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities**. ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

The following change has been made to Condition D.1.13 (now D.1.13 and D.3.14):

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Change 6:

The language stating that the condition is not federally enforceable has been removed from Conditions C.3, C.4, C.5 and C.7. Federal law states that failure to comply with any permit condition issued under a program that has been approved into a State Implementation Plan (SIP) is to be treated as a violation of the SIP (40 CFR 52.23). This has the effect of making all FESOP conditions federally enforceable. Indiana's FESOP program was approved as a part of Indiana's SIP at 40 CFR 52.788. Neither the program nor the underlying rule, 326 IAC 2-8 contains provisions for designating certain conditions as not federally enforceable.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. ~~The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FESOP Quarterly Report

Source Name: Altec, LLC
Source Address: 242 America Place, Jeffersonville, Indiana 47130
Mailing Address: P.O. Box 808, Jeffersonville, Indiana 47130
FESOP No.: F 019-13802-00015
Facility: One (1) twin paint booth (Unit 1)
Parameters: Total VOC, each individual HAP and combination of HAPs delivered to the applicators, plus VOC and HAPs used for cleanup
Limits: VOC: No more than 98.7 tons per consecutive twelve (12) month period, without the thermal oxidizer
Each Individual HAP: No more than 9.00 tons per consecutive twelve (12) month period, without the thermal oxidizer
Total HAPs: No more than 23.5 tons per consecutive twelve (12) month period, without the thermal oxidizer
With thermal oxidizer: VOC, individual HAP, and total HAPs Emissions no more than 98.7, 9.00, 23.5 tons per consecutive twelve (12) month period, respectively, where VOC/HAP Emissions (tons) = VOC/HAPs usage, including cleanup (tons) x (1 - Control Efficiency)

YEAR: _____

DATE OF STARTUP OF THERMAL OXIDIZER FOR EMISSION REDUCTION PURPOSES (if applicable): _____

Month	VOC (Tons)	VOC (Tons)	VOC (Tons)	Individual HAP (Tons)	Individual HAP (Tons)	Individual HAP (Tons)	Total HAPs (Tons)	Total HAPs (Tons)	Total HAPs (Tons)
	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**Altec, LLC**
Source Location:	**242 America Place, Jeffersonville, Indiana 47130**
County:	**Clark**
SIC Code:	**3354**
Operation Permit No.:	**F 019-13802-00015**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Alumnitec, Inc. relating to the operation of an aluminum parts extrusion source. On September 5, 2001, Alumnitec, Inc. notified IDEM, OAQ, that the source was sold to Ohio Valley Aluminum and will be operating as Altec, LLC. Alumnitec, Inc. was issued FESOP 019-5925 on December 10, 1996, which expires on December 10, 2001.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) twin paint booth, identified as Unit 1, constructed prior to 1973, exhausting at stacks 5A and 5B, each half of the booth equipped with two (2) electrostatic disc applicators for extruded aluminum frame coating and dry filters for overspray control, maximum capacity: 12.5 gallons of coating per hour.

(b) One (1) thermal oxidizer for VOC control, constructed prior to 1973, used during alternative operating scenarios, with start-up for preventive purposes on an as needed basis, heat input capacity: 3.0 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000)

British thermal units per hour, as follows:

(1) One (1) paint burn off cleaning furnace, fired by natural gas or propane, constructed in 1987, identified as Unit 3, heat input capacity: 0.35 million British thermal units per hour. [326 IAC 4-2-2]

(2) Five (5) aging ovens, fired by natural gas or propane, capacity: 3.5 million British thermal units per hour, each.

(3) One (1) billet oven, fired by natural gas or propane, capacity: 3.3 million British thermal units per hour.

(4) Two (2) billet ovens, fired by natural gas or propane, capacity: 5.4 million British thermal units per hour, each.

(5) One (1) pretreatment washer, fired by natural gas, capacity: 2.0 million British thermal units per hour.

(6) One (1) pretreatment washer, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(7) Two (2) office furnaces, fired by natural gas, capacity: 0.125 million British thermal units per hour, each.

(8) One (1) pretreatment drying oven, fired by natural gas, capacity: 2.7 million British thermal units per hour.

(9) One (1) paint bake oven, fired by natural gas or propane, capacity: 4.0 million British thermal units per hour.

(b) Degreasing operations (occasional wiping of parts for the purpose of cleaning)

(c) Quenching operations (rapidly cooling extruded aluminum after ovens by use of water)

(d) Paved roads and parking lots

(e) De-bridging process (sawing aluminum contact points in window frames).

(f) Combustion source flame safety purging on startup.

(g) Heat exchanger cleaning and repair.

(h) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(k) Filter or coalescer media changeout.

(l) Three (3) electric water heaters.

(m) One (1) electric heated caustic solution tank, using sodium hydroxide and water.

(n) One (1) mechanical blast unit equipped with a baghouse. [326 IAC 6-1]

Existing Approvals

(a) F019-5925-00015, issued on December 10, 1996, and expiring on December 10, 2001;

(b) A 019-7185-00015, issued on February 6, 1997; and

(c) AAF 019-9653-00015, issued on August 7, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 019-5925-00015, issued on December 10, 1996; and expiring on December 10, 2001, and AAF 019-9653-00015, issued on August 7, 1999

Condition D.1.4: The twin paint booth shall comply with 326 IAC 6-3-2(c): $E = 4.10P^{0.67}$, where E = rate of emissions in pounds per hour and P= process weight in tons per hour.

Reason not incorporated: This source is located in Clark County, which is listed in 326 IAC 6-1-7. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1 (Nonattainment area particulate limitations) are applicable to the one (1) twin paint booth. The requirements of 326 IAC 6-1 supercede the requirements of 326 IAC 6-3-2, and Condition D.1.4 from FESOP 019-5925-00015, issued on December 10, 1996, is rescinded in this proposed FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on January 19, 2001. Additional information was received on September 10 and September 26, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5 of 5).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	**Unrestricted Potential Emissions** (tons/year)
PM	greater than 100
PM_{10}	greater than 100
SO_2	less than 25
VOC	greater than 100
CO	less than 25
NO_X	less than 100

Note:

For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Unrestricted Potential Emissions** (tons/year)
Xylene	greater than 10
Ethyl benzene	less than 10
Benzene	less than 10
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Toluene	less than 10
Lead	less than 10
Cadmium	less than 10
Chromium	less than 10
Manganese	less than 10
Nickel	less than 10
TOTAL	greater than 25

(a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 10, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. The source's potential to emit is based on the emission units included in the original FESOP and in the subsequent Administrative Amendments.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
One (1) twin paint booth (Unit 1)	98.4	98.4	0.00	98.1	0.00	0.00	Individual 9.00 Total 23.5
Thermal Oxidizer	0.025	0.100	0.008	0.072	1.10	1.31	0.025
Insignificant Activities	0.754	1.46	0.100	1.40	14.1	23.8	0.796
Total PTE After Issuance	99.2	Less than 100	0.108	Less than 100	15.2	25.1	Single less than 10 Total less than 25

County Attainment Status

The source is located in Clark County.

Pollutant	**Status**
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Moderate Nonattainment

Pollutant	Status
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as non-attainment for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Clark County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit each individual hazardous air pollutant (HAP) is limited to less than 10 tons per year and the potential to emit any combination of HAPs is limited to less than 25 tons per year. Therefore, this source is not a major source of HAPs, and the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit of more than ten (10) tons per year of NO_X and VOC in Clark County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of $PM_{10,}$ SO_2, VOC, CO and NO_X shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. The specific limits are as follows:

(a) The amount of VOC delivered to the applicators at the one (1) twin paint booth (Unit 1), plus VOC used for cleanup, shall be limited to no more than 98.7 tons per consecutive twelve

(12) month period. This will limit the potential to emit VOC from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the thermal oxidizer is used to control VOC emissions, the amount of VOC delivered to the applicators, plus the VOC used for cleanup, shall be considered after the effect of the thermal oxidizer. This limitation will also make the requirements of 326 IAC 2-3, Emission Offset, not applicable.

(b) HAP emissions will be limited as follows:

(1) The worst case single HAP delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the amount of that HAP used for cleanup, shall not exceed 9.00 tons per consecutive twelve (12) month period. This will limit the potential to emit each individual HAP to less than 10 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-7 do not apply.

(2) The combination of HAPs delivered to the coating applicators at the one (1) twin paint booth (Unit 1), plus the total HAPs used for cleanup, shall not exceed a total of 23.5 tons per consecutive twelve (12) month period. This will limit the potential to emit total HAPs to less than 25 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-7 do not apply.

(3) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, in the event that the thermal oxidizer is used to control HAP emissions, the amount of HAP delivered to the applicators, plus the HAPs used for cleanup, shall be considered after the effect of the thermal oxidizer.

(c) The potential to emit PM_{10} from the total of all facilities at this source shall be less than 100 tons per year. The dry filters shall be operated at all times when the one (1) twin paint booth is in operation in order to comply with this limit. Therefore, the requirements of 326 IAC 2-7 are not applicable. As a result of this PM_{10} limit, and since PM is equal to PM_{10} at the twin paint booth, the PM emissions from the entire source will also be limited to less than 100 tons per year.

326 IAC 5-1 (Opacity Limitations)

This source is located in the Jeffersonville Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 4-2-2 (Incinerators)

Pursuant to 326 IAC 4-2-2, the one (1) insignificant paint burn off cleaning furnace, which serves as an incinerator, shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules);

(d) Be maintained properly as specified by the manufacturer and approved by IDEM;

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous materials including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented;

(h) Not create a nuisance or a fire hazard; and

(i) Not emit particulate matter (PM) in excess of 0.5 pounds per 1,000 pounds of dry exhaust gas corrected to fifty percent (50%) excess air.

The operation of the incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

The incinerator has a maximum exhaust rate of 0.01 pounds of PM per 1,000 pounds of dry exhaust gas, corrected to fifty percent (50%) excess air. Therefore, one (1) insignificant paint burn off cleaning furnace is in compliance with this rule.

326 IAC 6-1 (Nonattainment area particulate limitations)

This source is located in Clark County, which is listed in 326 IAC 6-1-7, but the source is not specifically listed in 326 IAC 6-1-17. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6-1-2 are applicable.

(a) Pursuant to 326 IAC 6-1-2(a), the one (1) twin paint booth (Unit 1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The dry filters shall be in operation at all times the one (1) twin paint booth is in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-1-2(a), the one (1) insignificant mechanical blast unit equipped with a baghouse at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The baghouse shall be in operation at all times the mechanical blast unit is in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) twin paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement. Operation of the thermal oxidizer is not required for the one (1) twin paint booth to comply with this rule. The effect of the thermal oxidizer will not be considered when demonstrating compliance with 326 IAC 8-2-9.

(b) Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, when practical, a nonphotochemically reactive hydrocarbon solvent, as defined in 326 IAC 1-2-48, shall be used to comply with (b) of this condition. The Permittee shall notify IDEM, OAQ, when changing to any VOC containing solvent and state the reasons thereof.

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (5a and 5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever

a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures for the one (1) twin paint booth (Unit 1) shall be performed as prescribed in the Preventive Maintenance Plan.

(d) The thermal oxidizer is not required to operate at all times that the twin paint booth is in operation. Pursuant to FESOP 019-5925-00015, issued on December 10, 1996, and AAF 019-9653-00015, issued on August 7, 1999, until actual startup of the thermal oxidizer, the Permittee may operate the thermal oxidizer alternatively for maintenance purposes only on an as needed basis, while not claiming emissions reductions for this unit. These startups for preventive maintenance purposes shall be documented accordingly.

(e) When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM.

(f) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained with a range as established in must recent compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment area particulate limitations) and 326 IAC 2-8 (FESOP), and, when using the thermal oxidizer to comply with VOC and HAP limitations, the thermal oxidizer must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and ensure that the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

Conclusion

The operation of this aluminum parts extrusion source shall be subject to the conditions of the attached proposed FESOP No.: F 019-13802-00015.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Altec, LLC**
Address City IN Zip: **242 America Place, Jeffersonville, Indiana 47130**
FESOP: **F 019-13802**
Plt ID: **019-00015**
Reviewer: **CarrieAnn Paukowits**
Date: **January 19, 2001**

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
King Bronze	10.15	22.01%	0.0%	22.0%	0.0%	70.43%	12.50000	2.23	2.23	27.93	670.20	122.31	43.34	3.17	90%
Polycron Super White	13.19	11.32%	0.0%	11.3%	0.0%	79.57%	12.50000	1.49	1.49	18.66	447.93	81.75	64.04	1.88	90%
							PM	Control Efficiency	80.00%						
State Potential Emissions			**Add worst case coating to all solvents**					**Uncontrolled**		**46.6**	**1118**	**204**	**107**		
								Controlled		**46.6**	**1118**	**204**	**21.5**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **Altec, LLC**
Address City IN Zip: **242 America Place, Jeffersonville, Indiana 47130**
FESOP: **F 019-13802**
Plt ID: **019-00015**
Reviewer: **CarrieAnn Paukowits**
Date: **January 19, 2001**

Material	Density (lbs/gal)	Gallons of Material (gal/hr)	Weight % Xylene	Weight % Ethyl benzene	Xylene Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)
King Bronze	10.15	12.50000	4.11%	0.00%	22.84	0.00
Polycron Super White	13.19	12.50000	10.00%	1.00%	72.22	7.22
				Individual Total	**95.1**	**7.22**
METHODOLOGY				**Overall Total**	**102**	

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Thermal Oxidizer

Company Name: Altec, LLC
Address City IN Zip: 242 America Place, Jeffersonville, Indiana 47130
FESOP: F 019-13802
Plt ID: 019-00015
Reviewer: CarrieAnn Paukowits
Date: January 19, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.00	26.28

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.025	0.100	0.008	1.31	0.072	1.10

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Thermal Oxidizer
HAPs Emissions

Company Name: Altec, LLC
Address City IN Zip: 242 America Place, Jeffersonville, Indiana 47130
FESOP: F 019-13802
Plt ID: 019-00015
Reviewer: CarrieAnn Paukowits
Date: January 19, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.76E-05	1.58E-05	9.86E-04	2.37E-02	4.47E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.57E-06	1.45E-05	1.84E-05	4.99E-06	2.76E-05	0.025

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Insignificant Activities

Company Name: Altec, LLC
Address City IN Zip: 242 America Place, Jeffersonville, Indiana 47130
FESOP: F 019-13802
Plt ID: 019-00015
Reviewer: CarrieAnn Paukowits
Date: January 19, 2001

Natural Gas Combustion Units that can also operate on Propane

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
35.95	314.92

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.299	1.20	0.094	15.7	0.866	13.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Natural Gas Combustion Units that can only operate on Natural Gas

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.65	67.01

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.064	0.255	0.020	3.35	0.184	2.81

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

HAPs from Natural Gas Combustion

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.01E-04	2.29E-04	1.43E-02	3.44E-01	6.49E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	9.55E-05	2.10E-04	2.67E-04	7.26E-05	4.01E-04	0.360

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e.,
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Insignificant Activities Using LPG-Propane

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur Content =	0.50
35.95	3441.77		

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	0.1 *(0.10S)*	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	0.688	0.688	0.086	24.09	0.860	3.270

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.
**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology
1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu
Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)
Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Degreasing Emissions based on F 019-5925-00015

VOC Potential to Emit 0.48 tons per year

Mechanical Blast Unit Emissions based on F 019-5925-00015

PM Potential to Emit 0.002 tons per year
PM-10 Potential to Emit 0.001 tons per year